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Prepped by Ollie Stewart

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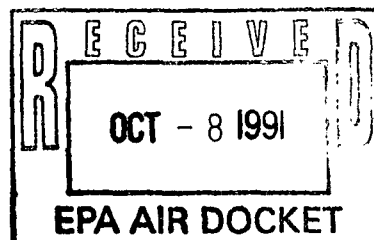
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October 3, 1991

U. S. Environmental Protection Agency
Public Docket A-91-46
Room M-1500
401 M Street, S.W.
Washington, D.C. 20460



Gentlemen:

Sergeant Oil & Gas CO., Inc., strongly supports The Ethyl Corporation's petition to allow the use of MMT octane booster in unleaded gasoline.

The cost savings from MMT for the American people will be significant for the following reasons:

1. Refinery output can be effectively reduced, thereby eliminating or postponing currently planned capital expenditures.
2. The use of MMT will reduce oil imports since lower octane materials now effectively excluded can again be used in gasoline.
3. The cost of producing a gallon of gasoline will be reduced even after considering the cost of MMT.
4. MMT will help the small gasoline blenders compete more effectively with major refiners.

Excluding lead from gasoline effectively eliminated the small blenders from the market place and allowed complete domination by the major refiners, and resulted in relatively higher gasoline prices. MMT can restore a semblance of competition to the market place.

Very truly yours,

John L. Orahood
John L. Orahood
Vice President

JLO:jo

cc: Ms. Mary T. Smith-EPA